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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**3:20-mj-00245**

**v.**

**MOTION TO DISMISS COMPLAINT  
WITH PREJUDICE**

**CYAN WATERS BASS,**

**Defendant.**

The United States of America respectfully moves this Court, pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, for an order dismissing with prejudice the Complaint filed September 29, 2020, charging defendant with Arson.

The government seeks this dismissal in the interest of justice. The defendant has pleaded guilty and has been sentenced in the Circuit Court of Oregon for the County of Multnomah,

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in-part, for conduct alleged in this complaint. Pursuant to an agreement between the parties, the government makes this motion to dismiss.

Dated: July 27, 2021

Respectfully submitted,

SCOTT ERIK ASPHAUG  
Acting United States Attorney

/s/ Parakram Singh  
PARAKRAM SINGH, OSB #134871  
Assistant United States Attorney